

Exhibit A

Proposed Order

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*
al.,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the
Commonwealth.

**ORDER GRANTING THREE HUNDRED NINETY-EIGHTH OMNIBUS OBJECTION
(NON-SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO TO
SUBSEQUENTLY AMENDED CLAIMS**

Upon the *Three Hundred Ninety-Eighth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico to Subsequently Amended Claims* [ECF No. 19546] (the “Three Hundred Ninety-Eighth Omnibus Objection”),² filed by the Commonwealth of Puerto Rico (“Commonwealth”), dated December 17, 2021, for entry of an order disallowing in their entirety certain claims filed against the Commonwealth, as more fully set forth in the Three Hundred

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5532-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Three Hundred Ninety-Eighth Omnibus Objection.

Ninety-Eighth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Three Hundred Ninety-Eighth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Three Hundred Ninety-Eighth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and each of the claims identified in the column titled “Claims to be Disallowed” in Exhibit A to the Three Hundred Ninety-Eighth Omnibus Objection (collectively, the “Claims to Be Disallowed”) having been amended and superseded by the subsequently filed proofs of claim identified in the column titled “Remaining Claims” in Exhibit A (collectively, the “Remaining Claims”); and the Court having determined that the relief sought in the Three Hundred Ninety-Eighth Omnibus Objection is in the best interests of the Commonwealth, its creditors, and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Three Hundred Ninety-Eighth Omnibus Objection establish just cause for the relief granted herein; and the Court having deemed a hearing is not necessary as no objection, responsive pleading, or request for a hearing with respect to the Three Hundred Ninety-Eighth Omnibus Objection has been submitted, and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Three Hundred Ninety-Eighth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that the Commonwealth’s right to object to the Remaining Claims on any grounds whatsoever is reserved; and it is further

ORDERED that Kroll is authorized and directed to designate as expunged the Claims to Be Disallowed on the official claims register in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 19546 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: _____

Honorable Judge Laura Taylor Swain
United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Three Hundred Ninety-Eighth Omnibus Objection

Three Hundred and Ninety-Eighth Omnibus Objection
Exhibit A - Claims to Be Disallowed

CLAIMS TO BE DISALLOWED

REMAINING CLAIMS

	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT		NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
1	GARAY MARRERO, JESSICA HC 1 BOX 5057 COROZAL, PR 00783	07/02/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	114624	Undetermined*		GARAY MARRERO, JESSICA HC 1 BOX 5057 COROZAL, PR 00783	06/23/21	17 BK 03283-LTS / Commonwealth of Puerto Rico	179418	\$ 21,535.16
	Reason: Amended and superseded by a later filed Proof of Claim.										
2	TOMASSINI, NORBERTO ET AL AND AYALA, IVAN ET AL, PLAINTIFF CREDITORS OF CONSOLIDATED JUDGMENT ENTERED ON APRIL 22, 2016 BY COURT OF FIRST INSTANCE OF AGUADILLA NORBERTO TOMASSINI ET AL (58 PLAINTIFFS) VAN AYALA ET AL28 PLAINTIFFS) ATTN. IVONNE GONZALEZ MORALES PO BOX 9021828 SAN JUAN, PR 00902-1828	05/07/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	12265	\$ 4,909,667.10		TOMASSINI, NORBERTO ET ALS AND AYALA, IVAN ET ALS. PLAINTIFFSS CREDITORS OF CONSOLIDATED JUDGMENT ENTERED APRIL 22, 2016 BY COURT FIRST INSTANCE. AGUADILLA. ATTN: IVONNE GONZALEZ-MORALES P O BOX 9021828 SAN JUAN, PR 00902-1828	10/01/21	17 BK 03283-LTS / Commonwealth of Puerto Rico	179637	\$ 5,832,721.95
	Reason: Amended and superseded by a later filed Proof of Claim.										